



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

NOV 27 2012

REPLY TO THE ATTENTION OF:

G. Vinson Hellwig, Chief
Michigan Department of Environmental Quality
Air Quality Division
Constitution Hall, 4th Floor
525 West Allegan Street
Lansing, Michigan 48909

Dear Mr. Hellwig:

This responds to your e-mail dated November 25, 2009 requesting that U.S. EPA provide guidance on an issue raised by General Motors (GM), in its November 24, 2009 letter to the Michigan Department of Environmental Quality (MDEQ), regarding its Orion Assembly Facility. You explained that the issue involves a GM claim that “roll-off tests’ performed inside a plant on autos on a dynamometer should not be subject to Title V requirements.”¹ You added that MDEQ currently has Title V permits with differing requirements for these operations, but the agency would like to be consistent in its permitting efforts. Included with your email you provide attachments with support information.²

As described by GM, the roll, road readiness, or end of line testing operation is one of the final steps of motor vehicle production in which fully assembled vehicles are driven to the test area where final checks are performed on various vehicle functions (for example, accelerating and braking). This includes a check that the vehicle emissions control systems are operating correctly and performance of a final quality check to ensure the vehicle is ready for the road. According to GM, a roll test is not a test of the engine. At the time a vehicle enters a roll test at Orion, it is ready for transportation. Such a vehicle has been assigned a VIN number, an emissions certification engine label, and a fuel economy window sticker.

Since the time of your initial request we have received two letters from the Automotive Alliance and, at their request, have held two informational meetings regarding testing at manufacturing plants including the type of “roll testing” that occurs at Orion. EPA has reviewed facts and information provided by your e-mail and by the Alliance of Automobile Manufacturers. We have also consulted with EPA headquarters offices and other EPA regional offices. While we do not necessarily concur with all of the supporting arguments presented by GM,³ because the testing is

¹ Title V generally does not impose substantive applicable requirements, thus we believe the question is whether substantive requirements apply under Clean Air Act programs that must be incorporated into the title V permit.

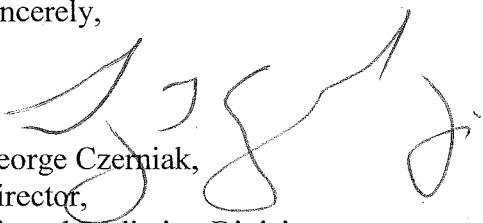
² See Orion Roll Test Cvr Ltr Hellwig - 11-24-09; Orion Roll Test Cvr Ltr - 11-17-09; Bob Stewart Letter 11-17-09; SSR Letter 10-03; Active MI Permits with Roll Test.

³ For example, GM and the Alliance misunderstand the limited scope of 40 C.F.R. Part 63, subpart P (NESHAP for Engine Test Cells/Stands) as an exemption from Title I regulations for installed engines.

done at a point when the vehicle is ready for introduction into commerce and the testing is for the purpose of checking the vehicle's readiness for transportation, we have concluded that the direct emissions from roll-off tests at the GM Orion facility are emissions resulting directly from internal combustion engines "for transportation purposes" within the meaning of Section 302(z) of the Clean Air Act and as such the engines in the vehicles tested are not subject to stationary source requirements.⁴ As a result, these emissions should not be included in permitting, except when the approved State Implementation Plan (SIP) regulations allow consideration of mobile emissions increases or reductions for applicability of those regulations. As allowed under state laws, states can always develop more stringent programs than those required under the Clean Air Act. However, such programs may not violate the provisions limiting state standards regulating mobile sources in section 209 of the Act. It may also be permissible for states to promulgate regulations on indirect sources, similar to those discussed in section 110(a)(5) of the Act.

I hope this letter clarifies EPA's interpretation of this issue and responds to your question. Please contact Charmagne Ackerman, of my staff, at (312) 886-0448 if you have any additional questions or would like to discuss specific issues regarding this matter.

Sincerely,



George Czerniak,
Director,
Air and Radiation Division

Attachments:

1. Orion Roll Test Cvr Ltr Hellwig - 11-24-09
2. Orion Roll Test Cvr Ltr - 11-17-09
3. Bob Stewart Letter 11-17-09
4. SSR Letter 10-03
5. Active MI Permits with Roll Test

⁴ Unlike emissions from nonroad engines and vehicles, which are categorically exempted, section 302(z) does not categorically exempt emissions from motor vehicles from the definition of stationary source. Instead, section 302(z) exempts "emissions resulting directly from an internal combustion engine for transportation purposes."



November 24, 2009

Mr. G. Vinson Hellwig
Michigan Department of Environmental Quality
Air Quality Division
Division Chief
Constitution Hall, 3rd Floor
525 West Allegan Street
P.O. Box 30260
Lansing, Michigan 48909-7760

RE: Issue Resolution for Roll Test at Orion Assembly - Permit Application 224-09

Dear Mr. Hellwig:

General Motors (GM) has applied for a Permit-to-Install for a new paint shop at the Orion Assembly plant. The new paint shop is scheduled to begin construction in early 2010. As part of the application, General Motors is pursuing a flexible permit that requires inclusion of all stationary VOC sources. General Motors did not include the Roll Test operation as part of the permit application submittal because the Roll Test operation is regulated under Title II of the federal Clean Air Act and should not be included in this permit because of federal preemption. However, the Michigan Department of Environmental Quality (MDEQ) staff indicated to GM that they believe Roll Test should be in the application. The Roll Test operation occurs in General Assembly near the end of the assembly line and furthermore is not being modified. Roll Test is used to ensure that operations such as braking and the emission control systems (via the engine control module) are operating correctly. It is not a test of the engine.

Since a resolution on whether to include the Roll Test operation in the permit application could not be reached, General Motors was directed by MDEQ staff to follow the Issue Resolution process outlined in MDEQ Operational Memorandum Number 19, under the Policy Issues Section. General Motors has retained outside legal counsel Bob Stewart, a partner at Kelly, Hart & Hallman with over three decades of experience in air quality law, to provide legal advice on whether Roll Test is a Title I source. Mr. Stewart provided legal advice and analysis that was submitted along with a summary letter to Mr. William Presson on November 17, 2009, as the first step of the issue resolution process.

On November 19, 2009, Mr. Presson, MDEQ General Manufacturing Unit Permit Supervisor, responded to General Motors Issue Resolution request by conference call. It was Mr. Presson's opinion was that the vehicle is still in the manufacturing process and not a complete vehicle when the Roll Test is performed. Therefore, the Roll Test operation should be considered a stationary source and the vehicle is not subject to Title II regulation until the vehicle leaves the facility. GM strongly disagrees with this analysis and believes that the fully assembled and operating vehicle is not

considered a stationary source. Moreover, at the point of Roll Test, there is no question the engine is a completed product and the only emissions during Roll Test are from the engine. The purpose of Roll Test is to perform operations such as braking; check that the emission control systems are operating correctly; and performance of a final quality check to ensure the vehicle is ready for the road. Once the vehicle enters Roll Test it is ready for transportation and subject to Title II regulations. General Motors believes that the vehicle is subject to the Title II regulations at Roll Test because 1) it has a VIN number and is recognized as a motor vehicle, 2) it has a window sticker which indicates it is ready for sale, and more importantly, 3) its emissions are already regulated under Title II of the Clean Air Act. If one follows the logic of Mr. Presson's comments that the vehicle is regulated under stationary source rules until it physically leaves the facility then activities such as driving the vehicle in the parking lot for shipment to GM dealers would make the parking lot a stationary source subject to regulation. Clearly, this is not the intent of the law. Moreover, Title II exempts motor vehicle engines as well as motor vehicles. The only emissions from the Roll Test are from the engine and thus exempt.

General Motors has also reviewed previous actions on Roll Test operations in other assembly plants. In response to a question from the EPA on Roll Test, the State of Georgia Department of Natural Resources stated that the Roll Test operation to be installed in a new Kia Motors plant was not a stationary source. The Georgia DNR stated as follows:

"To clarify, area in question is a vehicle testing stand and area, not an engine test stand. The vehicles are fully assembled at the point of testing, and the tests involve final checks of road-worthiness and quality assurance. There is no stationary stands for which engines to be mounted and tested. The Clean Air Act Amendments of 1990 define stationary source as "generally any source of an air pollutant except those resulting directly from an internal combustion engine for transportation purposes."

The finished vehicles, at this point, are subject to EPA's emission standards for light-duty onroad vehicles is further support that the vehicle emissions during testing should be considered mobile and not stationary in nature."

The permit for Kia Motors was released without an emission unit for Roll Test.


Similarly, in Ohio, OEPA recognized that Roll Test operations are regulated by Title II. To avoid confusion and clarification on this position, the agency codified its position by including language in its rules explicitly clarifying that Roll Test operations do not need stationary source permits.

In Michigan, General Motors reviewed the facilities that currently have permits with Roll Test as an emission unit. Of the twelve active assembly permits in Michigan, only two have Roll Test emission units because those two facilities had PSD permits which required all emissions to be categorized. In hindsight, General Motors should have asked for Roll Test to be removed as an emission unit, since it is regulated under Title II. However, the majority of assembly plants (all of which employ Roll Test) do not have a Roll Test Emission Units in their MDEQ permits. General Motors also discussed the Roll Test operation with the MDEQ on other permits. During a conference call on September 20,

2001, the MDEQ stated that General Motors could remove the Roll Test Operation from the Lansing Craft Centre permit. Furthermore, in 2001 as part of a Value Stream mapping exercise with Chrysler, Ford and GM; General Motors received correspondences from the MDEQ that Roll Test did not need to be included in the permit. GM has not been able to locate this written correspondence.

Based on the information included and the attached letter from Bob Stewart, General Motors believes the Roll Test operation should not be part of the current application at Orion Assembly. If you have any questions or need further information, feel free to contact me at 248-255-7796.

Sincerely,



Rusty Helm

General Motors
Manager Air Support Operations

Attachments:

1. Final Determination of Kia Motor Manufacturing from Georgia DNR
2. Letter to Mr. Vrajesh Patel from General Motors on October 3, 2001 regarding Roll Test and Permit No. 198-01 (Lansing Craft Centre)
3. Active Michigan Permits with Roll Test as an Emission Unit
4. Letter to Mr. Bill Presson on November 19, 2009 starting the Issue Resolution Process on the Roll Test operation at Orion Assembly
5. Memo to Mr. Rusty Helm from Mr. Bob Stewart on Roll Test applicability
6. EPA correspondences on Jet Engine Test Cells



November 17, 2009

Mr. William Presson
Michigan Department of Environmental Quality
Air Quality Division
Section Supervisor
Constitution Hall, 3rd Floor
525 West Allegan Street
P O. Box 30260
Lansing, Michigan 48909-7760

RE: Issue Resolution for Roll Test at Orion Assembly - Permit Application 224-09

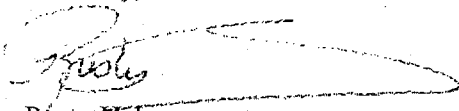
Dear Mr. Presson:

General Motors (GM) has applied for a Permit-to-Install for a new paint shop at the Orion Assembly plant. The new paint shop is scheduled to begin construction in early 2010. As part of the application, General Motors is pursuing a flexible permit that requires inclusion of all stationary VOC sources. General Motors did not include the Roll Test operation as part of the permit application submittal because the Roll Test operation is regulated under Title II of the federal Clean Air Act and should not be included in this permit because of federal preemption. However, the Michigan Department of Environmental Quality (MDEQ) staff indicated to us that they believe Roll Test should be in the application. The Roll Test operation occurs in General Assembly near the end of the assembly line. Roll Test is used to ensure that operations such as braking and the emission control systems (via the engine control module) are operating correctly. It is not a test of the engine.

Since a resolution on whether to include the Roll Test operation in the permit application could not be reached, General Motors was directed by MDEQ staff to follow the Issue Resolution process outlined in MDEQ Operational Memorandum Number 19, under the Policy Issues Section. General Motors has retained outside legal counsel Bob Stewart, a partner at Kelly, Hart & Hallman with over three decades of experience in air quality law, to provide legal advice on whether Roll Test is a Title I source. Based on the attached letter, General Motors believes the Roll Test operation should not be part of the current application at Orion Assembly.

If you have any questions or need further information, feel free to contact me at 248-255-7796.

Sincerely,


Rusty Helm
General Motors
Manager Air Support Operations

Attachments

KELLY HART & HALLMAN LLP

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201 Main Street, Suite 2500
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1000 Louisiana, Suite 4700
Houston, Texas 77002

November 17, 2009

Rusty Helm
Manager Air Support Operations
General Motors Company
30200 Mound Road
MC 480-111-W73
Warren, MI 48090

Re: Exclusion of Emissions from Roll Test from Permit to Install

Dear Rusty:

This is in response to your request for legal advice regarding whether emissions from the roll test operation at GM's Orion, Michigan assembly plant should be included in the facility's permit to install. My understanding is that GM has applied for a Permit to Install ("PTI") that would authorize construction of a new paint shop without modification of the roll test operation in any manner. The roll test is performed on the fully assembled vehicle to test its emission control equipment (via the engine control module), brakes, and other vehicle electronically controlled systems. It is not a test of the engine, but only vehicle components.

As explained below, emissions from roll test are not regulated by Title I of the federal Clean Air Act ("CAA"). The vehicles undergoing roll test are mobile sources and emissions from them are exclusively regulated by EPA under Title II of CAA. Thus, roll test emissions should not be included in the PTI.

Federal Courts Have Upheld Preemption of State Regulation of Emissions from Mobile Sources

Federal preemption of state regulation of emissions from mobile sources under Section 209 of CAA has been consistently upheld by federal court decisions. See, for example, *Engine Manufacturers Association v. Huston*, 190 F.Supp.2d 922 (WD Texas 2001); *American Automobile Manufacturers Association v. Massachusetts Department of Environmental Protection*, 163 F.3d 74, 77 (1st Cir. 1998) ("[t]he federal government thus has complete and exclusive authority to regulate motor vehicle emissions, and any state regulation of this area is expressly preempted."); and *State of Connecticut, et al v. American Electric Power, et al*, 582 F.3d 309, 376 (2nd Cir. 2009) ("While the states have significant latitude in setting stationary source emissions limits to meet the NAAQS, the Act reserves to the federal government

exclusive authority to regulate motor vehicle emissions, although it permits the state of California to adopt its own standards.”)

Thus, the state is federally preempted from adopting or enforcing any standard relating to the control of emissions from new motor vehicles or new motor vehicle engines pursuant to Section 209(a) of the CAA. The term “new motor vehicle” is defined in CAA as “a motor vehicle the equitable or legal title to which has never been transferred to an ultimate purchaser.” The term “new motor vehicle engine” is defined in CAA as “an engine in a new motor vehicle or a motor vehicle engine the equitable or legal title to which has never been transferred to the ultimate purchaser.” CAA Section 216(3). Thus, the fact that the motor vehicles and motor vehicle engines are owned by GM expressly makes them new motor vehicles and new motor vehicle engines. Moreover, the federal preemption applies not only to new motor vehicles, but also to new motor vehicle engines. The engine is a completed product when the vehicle is placed on the roll test to test its emission control equipment (via the engine control module), brakes and other vehicle electronically controlled systems. The vehicles are fully assembled at the point of roll test and the test involves final checks of road-worthiness and quality assurance. Failure of a roll test does not result in any repair to the engine, but only to vehicle components such as emission control equipment or brakes.

U.S. EPA Regulations Demonstrate the Broad Scope of the Title II Federal Preemption

Consistent with the federal preemption in Section 209 of CAA, Section 302(z) of CAA defines the term “stationary source” to exclude emissions resulting from an internal combustion engine for transportation purposes and nonroad engines. Likewise, the federal preemption in Section 209 of the CAA applies to both on road and nonroad engines. EPA’s regulatory activity with respect to nonroad engines demonstrates the broad scope that EPA accords to the Title II federal preemption. U.S. EPA has defined nonroad engine in 40 C.F.R. Section 89.2 such that an internal combustion engine in self-propelled equipment being used at a manufacturing facility expressly for manufacturing purposes is not considered part of the stationary source. This demonstrates that integration with the manufacturing process does not provide a legal basis to regulate a mobile source as part of a stationary source.

This preemption by Title II of CAA is further confirmed by U.S. EPA’s promulgation of National Emission Standards for Hazardous Air Pollutants for engine test cells/stands. That rule under Title I of the CAA regulates only uninstalled engines. See, 40 CFR § 63.9285. The preamble to this rule confirms that it does not apply to installed engines: “The final rule regulates the testing of engines, not the testing of any final product (e.g., automobile, boat, power generator, etc.). If the engine being tested in a test cell/stand is not installed in, or an integrated part of, the final product, then the test cell/stand is considered part of the affected source.” 68 Fed Reg. 28774 at 28776 (May 27, 2003). The preamble to this rule also provides as follows: “The final rule specifically excludes test cells that are operated to test or evaluate fuels (such as knock engines), transmissions, electronics, etc.” *Id.* This is precisely the type of testing that occurs during roll test.

Guidance Letters Issued by U.S. EPA Further Demonstrate the Distinction Between Emissions from Stationary and Mobile Sources

In letters to the Georgia Department of Natural Resources, U.S. EPA stated that emissions from testing of engines removed from aircraft are considered emissions from a stationary source. In contrast, according to EPA, emissions from testing of jet engines performed without removal of the engines from the aircraft are considered emissions from mobile sources. See, letters to Edward A. Cutrer, Jr., from U.S. EPA Region IV dated December 1, 1995 and March 12, 1996. Similarly, since the roll test is performed with the engines in the vehicles, the emissions are from mobile sources and not from a part of the stationary source.

Requiring Roll Test to Be Permitted Would Result in Unintended Consequences

If the roll test were required to be permitted, then all of the stations throughout the state where individuals take their automobiles to be emission control tested would also require permits. The definition of "motor vehicle" in the CAA does not depend on the location of the vehicle. Section 216(2) of CAA defines the term "motor vehicle" as "any self-propelled vehicle designed for transporting person or property on a street or highway." Importantly, this definition sheds light on the phrase "for transportation" in Section 302(z) of CAA. It is clear from the definition in Section 216(2) that if equipment is "designed" for transportation, it is a motor vehicle even before it has been actually used for transportation. Thus, the phrase "for transportation purposes" in Section 302(z) must be interpreted as designed for transportation, not actually in transportation. Therefore, the location and actual use of the motor vehicle are not relevant factors under the CAA in determining preemption.

Conclusion

As discussed above, the definition of motor vehicle in Section 216(2) and EPA's regulatory activities with respect to nonroad engines in 40 C.F.R. Section 89.2, clearly indicate that Title II regulates motor vehicles and motor vehicle engines as well as nonroad engines even though they have not yet been introduced into commerce.

Moreover, Title II not only preempts state regulation of motor vehicles, but also motor vehicle engines. The motor vehicle engines are final products when the car is driven onto the roll test. The roll test tests the brakes and emission control device, not the engine itself. A vehicle designed for transportation is a "motor vehicle" with respect to which state regulation is preempted. Section 216(2) of the CAA.

Whether or not a motor vehicle is already in commerce and whether or not it is owned by the owner of the stationary source has no relevance to whether the motor vehicle is regulated under the preemptive provisions of Title II. The definition of motor vehicle in Section 216(2) is not dependent on location or ownership. Moreover, EPA's regulatory activity with respect to nonroad engines in 40 C.F.R. Section 89.2 and rules under Title I on uninstalled engines demonstrate that mobile sources regulated under Title II of the CAA are not part of a stationary source, even when they are located there, owned by the person who owns the stationary source and used in the manufacturing operation.

Based on the foregoing, emissions from roll test are not regulated by Title I of the federal Clean Air Act. The vehicles undergoing roll test are mobile sources and emissions from them are exclusively regulated by EPA under Title II of CAA. No emissions from roll test should be included in the PTI.

If you have any questions or need further information, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Bob Stewart", with a horizontal line extending from the end of the signature.

Robert T. Stewart



General Motors Corporation
Worldwide Facilities Group
Facility Environmental Services

October 3, 2001

Mr. Vrajesh Patel
Environmental Engineer
Department of Environmental Quality
Air Quality Division
P.O. Box 30260
Lansing, Michigan 48909

Dear Mr. Patel:

The intent of this letter is to follow-up on the open issues that remain in the review of the air permit application for the Lansing Craft Centre (No. 198-01).

Transfer Efficiency (TE) Used in Repair Operations

You had indicated that the transfer efficiency rate appeared low for the repair operations in the worksheet provided to you as part of the permit application. As we discussed in a telephone conversation, the repair operations are performed with manual applicators, which achieve a lower TE than any type of robotic application. Attached is the CMW-Solids worksheet with an additional column indicating the type of application for each process.

Sludge Factor of 1%

In your additional information request dated August 10, 2001, you had asked for an explanation regarding why sludge was listed as a sub process portion of the basecoat-tricoat process. As discussed with the MDEQ in the past review of the Delta Township permit, it was recognized that there is some loss of solvent in the waterwash system that does not reach the air stream of a control device. Especially in a waterwash system where the solvents are highly soluble in water.

Although there was recognition of the issue, there were differences in the opinion of the percentage lost. GM believed it could be as high as 15 percent and MDEQ believed the magnitude was more like one percent based on some test data from Chrysler, which could not be found. Therefore, as a very conservative assumption, GM used the one percent loss in the SSR permit application as it relates to tons of VOC reduced by the control device. Total emissions were accounted for (i.e. the one percent is a fugitive component of the total emissions) in the emissions calculations and modeling analysis.

Vehicle Start-up and Roll Test Toxics Analysis

During our conference call on September 20, 2001, you had indicated that we could remove the Vehicle Start-Up and Roll Test source from the permit application, based

upon a decision that was made by MDEQ management. General Motors has decided to keep this operation part of the permit application for the SSR project in order to avoid any comments during the public comment period, and subsequent delays. On August 17, 2001, a request was made to provide the toxic analysis for vehicle start-up and roll test. Criteria pollutants were calculated and summarized in Table 6.12 of the permit application, where it was shown that the proposed VOC emissions totaled 0.16 tons per year. Since we do not have any data speciating the VOC emissions, we did not do a toxics analysis for this project. Additionally, this has been the same approach for all prior permit applications including LGR and Delta Township.

Acetone Emissions

In an e-mail you sent to me on August 17, 2001, you requested that I confirm the total amount of acetone emissions that will result from our proposed changes. Attached is a table, which provides that summary.

112g Applicability

In the additional information request dated August 23, 2001, you asked for a write up that the proposed modification is not subject to Federal Requirement 112g under the definition of reconstruction. Under the definitions listed in 40 CFR 63.41, reconstruction of a major source occurs when the fixed capital cost of the new components exceed 50 percent of the fixed capital cost that would be required to construct a comparable process or production unit. At the Lansing Craft Centre, the cost for the proposed modifications for the Elpo, Primer Surfacer, Topcoat and all other sources do not exceed 50 percent of the fixed capital cost to construct a comparable unit. Therefore, since the Elpo, Primer Surfacer or Topcoat processes are not being replaced, it is intuitive that the costs will not exceed 50 percent of the fixed capital cost to construct a comparable unit.

Lead-Free Elpo

You had requested an explanation regarding our Elpo material selection. We do plan on using lead-free Elpo material at the Lansing Craft Centre for the SSR and all additional vehicles. Therefore, we do not need the flexibility of using lead-containing material in the future.

Storage Tanks

In our conference call on September 20, 2000, Mark Mitchell had requested that I confirm the number of storage tanks to be utilized at the LCC for the new project. The four tanks that were included in the permit application and modeling submittal are the only tanks with associated emissions that will be utilized for the SSR Project. All other process fluids that will be needed will be supplied in drums.

Sound Dampening Process

General Motors was asked to provide a process description for the sound dampening operation. The proposed operation will consist of an acoustical dampening product that will be applied using either manually or robotic spray equipment in the open plant air (i.e. no booth). There are no stacks associated with this process.

Outstanding Issues

In our conference call on September 20, 2001 you had remaining questions regarding miscellaneous solvents, abatement of the waterborne system, and the capture efficiency rate used in the BACT analysis. These items will be addressed, along with any other remaining BACT items, in a separate submittal.

In summary, this letter includes GM's response to the outstanding questions you have. The remaining information you have requested will be forwarded, as it becomes available. If you have any additional questions, please contact me at (248)-680-5107.

Sincerely,

Kimberly A. Essenmacher

Kimberly Essenmacher, CHMM
Senior Environmental Engineer

General Motors

SRN	Source	Roll Test	Comments
M4199	Detroit Hamtramck Assembly	No	
B1604	Flint Assembly	No	
N6950	Lansing Delta Township Assembly	Yes	New PSD Permit, required listing all emissions
A1641	Lansing Grand River Assembly	Yes	New PSD Permit, required listing all emissions
B7227	Orion Assembly	No	
B4031	Pontiac Assembly	No	

Chrysler

SRN	Source	Roll Test	Comments
N2155	Chrysler Jefferson North Assembly	No	
B7248	Chrysler Sterling Heights Assembly	No	
B2767	Chrysler Warren Truck Assembly	No	

Ford

SRN	Source	Roll Test	Comments
A8650	Ford Assembly and Michigan Truck	No	
A8648	Ford Dearborn	No	
N0929	AutoAlliance Interantional Flat Rock	No	